

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

RICHARD JORDAN and RICKY CHASE

Plaintiffs

**THOMAS EDWIN LODEN, JR.,
ROGER ERIC THORSON, and
ROBERT SIMON, JR.**

Intervenors

No. 3:15-cv-00295-HTW-LGI

vs.

BURL CAIN, Commissioner, et al.

Defendants

DECLARATION OF STACY FERRARO

I, Stacy L. Ferraro, declare the following to be true to the best of my personal knowledge:

1. I am over 21 years of age, and otherwise competent to testify.
2. I am a member of the Mississippi Bar and admitted to practice in this Court.
3. I am counsel for Intervenors Thomas E. Loden, Jr., and Robert Simon, Jr., in this civil action.
4. On September 29, 2022, I received a letter from Mr. Loden dated September 21 and postmarked September 26. In my experience representing individuals in custody, it often takes a number of days between the time when my client deposits a letter with prison authorities and the time when the prison mails that same letter to me.
5. Mr. Loden's correspondence enclosed a letter written by Mississippi Circuit Judge Michael P. Mills, Jr., to Attorney General Lynn Fitch. Mr. Loden was copied on the letter, which was dated September 12, 2022, but I was not. No other attorney for Mr. Loden was copied on the letter. The letter from Judge Mills is attached as Exhibit A to this Declaration.

6. I declare under penalty of perjury under the laws of North Carolina and the United States of America that the foregoing declaration is true and correct, and that this declaration was signed by me on October 7, 2022.


Stacy L. Ferraro